

AMENDED ENVIRONMENTAL COMPLIANCE APPROVAL

NUMBER 6625-6EMMZ3
Issue Date: November 4, 2021

Veolia ES Canada Industrial Services Inc.
141 Prosperity Way RR3
Chatham-Kent, Ontario
N7M 5J3

Site Location: 141 Prosperity Way RR3
Chatham-Kent Municipality,
N7M 5J3

You have applied under section 20.2 of Part II.1 of the Environmental Protection Act, R.S.O. 1990, c. E. 19 (Environmental Protection Act) for approval of:

a 2.2 hectare waste disposal site to be used for the transfer and processing of the following types of waste:

- non-hazardous solid industrial waste;
- waste electrical and electronic waste;
- batteries and fluorescent lamps;
- liquid industrial waste;
- hazardous waste limited to Waste Classes 111 to 114 inclusive, 121, 122, 123, 131 to 135 inclusive, 141 to 150 inclusive, 211, 212, 213, 221, 222, 231, 232, 233, 241, 242, 251 to 254 inclusive, 261 to 270 inclusive, 281, 282 and 331 as described in the Ministry of the Environment's "New Ontario Waste Classes" document dated January 1986 or as amended

with the following emission sources:

- exhausts serving ten (10) outdoor storage tanks (T101 to T110), each having a capacity of 90 cubic metres, used to contain fuel blends, extending 9.1 metres above grade;
- exhaust serving one (1) indoor storage tank (T203), having a capacity of 22.7 cubic metres,

- used to contain a fuel blend, extending 1.2 metres above the roof, or 8.84 metres above grade;
- exhaust serving one (1) indoor storage tank (T204), having a capacity of 55 cubic metres, used to contain a fuel blend, extending 1.2 metres above the roof, or 8.84 metres above grade;
 - exhaust serving one (1) indoor storage tank (T207), having a capacity of 46.4 cubic metres, used to contain a fuel blend, extending 0.9 metres above the roof, 8.53 metres above grade;
 - exhausts serving five (5) indoor storage tanks (T201, T202, T205, T209, T210);
 - exhaust serving the process water tank (EX-PWT);
 - exhausts serving two (2) diesel fuel tanks each having a capacity of 3.7 cubic metres;
 - exhaust serving one (1) gasoline fuel tank having a capacity of 1.8 cubic metres;
 - one (1) Inductively Coupled Plasma (ICP) laboratory fume hood (ICP-FH);
 - three (3) laboratory fume hoods (FH-1, FH-2 and FH-3), each exhausting into the atmosphere at a volumetric flow rate of 0.18 cubic metre per second, via separate stacks, having an exit diameter of 0.1 metre, extending 1.08 metres above the roof and 4.3 metres above grade;
 - natural gas fired combustion equipment for comfort heating, having a combined heat input of 9,706,000 kilojoules per hour; and
 - three (3) on-site fuel storage tanks having capacities of 4.6 cubic metres (Tank 1), 2.3 cubic metres (Tank 2) and 1.36 cubic metres (Tank 3), used for fuelling internal fleet vehicles.

For the purpose of this environmental compliance approval, the following definitions apply:

"Approval" means this Environmental Compliance Approval and any Schedules to it, including the application and supporting documentation listed in Schedule "A";

"Director" means a person appointed by the Minister pursuant to section 5 of the EPA for the purposes of Part II.1 of the EPA;

"District Manager" means the District Manager of the local district office of the Ministry in which the Site is geographically located;

"EPA" means the Environmental Protection Act, R.S.O. 1990, c. E. 19, as amended;

"Equipment" means the laboratory fume hoods, storage tanks and natural gas fired combustion equipment described in the Owner's application, this Approval and in the supporting documentation submitted with the application, to the extent approved by this Approval;

"Lab Packs" means the waste management industry's recognized method of temporarily storing and transporting miscellaneous organic and inorganic wastes in a drum or tote;

"Listed Subject Waste" means a hazardous industrial waste (Schedule 1), acute hazardous waste chemical (Schedule 2(A)), hazardous waste chemical (Schedule 2(B)) and severely toxic waste (Schedule 3) as listed in the schedules of Reg. 347;

"Manual" means a document or a set of documents that provide written instructions to staff of the Owner;

"Ministry" means the ministry of the government of Ontario responsible for the EPA and includes all officials, employees or other persons acting on its behalf;

"Operator" means any person, other than the Owner's employees, authorized by the Owner as having the charge, management or control of any aspect of the Site;

"Owner" means any person that is responsible for the establishment or operation of the Site being approved by this Approval, and includes Veolia ES Canada Industrial Services Inc., its successors and assigns;

"OWRA" means the Ontario Water Resources Act, R.S.O. 1990, c. O-40, as amended from time to time;

"PA" means the Pesticides Act, R.S.O. 1990, c. P-11, as amend from time to time;

"Provincial Officer" means any person designated in writing by the Minister as a provincial officer pursuant to section 5 of the OWRA or section 5 of the EPA or section 17 of PA;

"Publication NPC-205" means the Ministry Publication NPC-205, "Sound Level Limits for Stationary Sources in Class 1 & 2 Areas (Urban)", October, 1995 as amended;

"Publication NPC-232" means the Ministry Publication NPC-232, "Sound Level Limits for Stationary Sources in Class 3 Areas (Rural)", October, 1995 as amended;

"Reg. 347" means Regulation 347, R.R.O. 1990, made under the EPA, as amended from time to time;

"Site" means the entire 2.2 hectare waste disposal site described as Part of Lot 17, Concession A, Geographic Township of Raleigh, Municipality of Chatham-Kent, Part of Part 2 on Registered Plan 24R-7195, inclusive of the operations and Equipment as approved by this Approval;

"Sewer Use By-law" means By-Law Number 4-2000 of the Corporation of the Municipality of Chatham-Kent, as amended from time to time;

"Trained Personnel" means person(s) knowledgeable in the following through instruction and/or practice:

- (i) relevant waste management legislation, regulations and guidelines;
- (ii) major environmental concerns pertaining to the waste to be handled;
- (iii) occupational health and safety concerns pertaining to the processes and wastes to be handled;
- (iv) management procedures including the use and operation of equipment for the processes and wastes to be handled;
- (v) emergency response procedures;
- (vi) specific written procedures for the control of nuisance conditions;
- (vii) specific written procedures for refusal of unacceptable waste loads; and
- (viii) the requirements of this Approval; and

"Treated Wastewater" means wastewater that has been processed in accordance with the application and supporting documentation to remove the hazardous characteristic of liquid industrial waste, ignitable waste, corrosive waste or leachate toxic waste.

You are hereby notified that this environmental compliance approval is issued to you subject to the terms and conditions outlined below:

TERMS AND CONDITIONS

1.0 GENERAL

Compliance

- 1.1 The Owner shall ensure compliance with all the conditions of this Approval and shall ensure that any person authorized to carry out work on or operate any aspect of the Site is notified of this Approval and the conditions herein and shall take all reasonable measures to ensure any such person complies with the same.
- 1.2 Any person authorized to carry out work on or operate any aspect of the Site shall comply with the conditions of this Approval.

Build, etc. in Accordance

- 1.3 Except as otherwise provided by these conditions, the Site shall be designed, developed, used, maintained and operated, and all facilities, equipment and fixtures shall be built and installed, in accordance with the conditions of this Approval, and all other supporting documents listed in Schedule "A" of this Approval.

Interpretation

- 1.4 Where there is a conflict between a provision of any document, including the application, referred to in this Approval, and the conditions of this Approval, the conditions in this Approval shall take precedence.

- 1.5 Where there is a conflict between the application and a provision in any documents listed in Schedule "A", the application shall take precedence, unless it is clear that the purpose of the document was to amend the application and that the Ministry approved the amendment.
- 1.6 Where there is a conflict between any two documents listed in Schedule "A", other than the application, the document bearing the most recent date shall take precedence.
- 1.7 The requirements of this Approval are severable. If any requirement of this Approval, or the application of any requirement of this Approval to any circumstance, is held invalid or unenforceable, the application of such requirement to other circumstances and the remainder of this Approval shall not be affected thereby.

Other Legal Obligations

- 1.8 The issuance of, and compliance with the conditions of, this Approval does not:
- (a) relieve any person of any obligation to comply with any provision of any applicable statute, regulation or other legal requirement; or
 - (b) limit in any way the authority of the Ministry to require certain steps be taken or to require the Owner to furnish any further information related to compliance with this Approval.
- 1.9 The Owner shall ensure that all of the wastes generated at the Site are disposed in accordance with Reg. 347.
- 1.10 The receipt of any information by the Ministry or the failure of the Ministry to prosecute any person or to require any person to take any action, under this Approval or under any statute, regulation or other legal requirement, in relation to the information, shall not be construed as:
- (a) an approval, waiver, or justification by the Ministry of any act or omission of any person that contravenes any term or condition of this Approval or any statute, regulation or other legal requirement; or
 - (b) acceptance by the Ministry of the information's completeness or accuracy.

Exemption for Chlorinated Solvents

- 1.11 Chlorinated solvent being transported from the Site to St. Lawrence Cement is exempt from Part V of the EPA and Reg. 347 provided that:
- (a) the solvent meets the following chemical and compositional criteria:
 - (i) it has a minimum of 2% chlorine content; and
 - (ii) it is a complex mixture of chlorinated hydrocarbons in a chlorinated aromatic hydrocarbon base; and

- (iii) it does not contain more than 10 ppm of any residual organochlorine pesticides; and
 - (iv) it does not contain more than 5 ppm of polychlorinated biphenyls (PCBs); and
- (b) a chemical analysis for each load is submitted to St. Lawrence Cement prior to its use at the facility. The analysis shall include, but not be limited to, the following:
- (i) percent chlorine content;
 - (ii) concentration of organochlorine pesticides, reported in ppm; and
 - (iii) concentration of PCBs, reported in ppm; and
- (c) the solvent is transported by a hauler holding a valid Environmental Compliance Approval directly to the St. Lawrence Cement facility located at 2391 Lakeshore Road West, Mississauga, Ontario for use in the production of reduced alkali clinker in the facility's kiln.

Adverse Effects

- 1.12 The Site shall be operated and maintained at all times including management and disposal of all waste in accordance with the EPA, Reg. 347 and the conditions of this Approval. At no time shall the discharge of a contaminant that causes or is likely to cause an adverse effect be permitted.
- 1.13 The Owner shall take steps to minimize and ameliorate any adverse effect on the natural environment or impairment of water quality resulting from the Site, including such accelerated or additional monitoring as may be necessary to determine the nature and extent of the effect or impairment.
- 1.14 Despite an Owner, Operator or any other person fulfilling any obligations imposed by this Approval, the person remains responsible for any contravention of any other condition of this Approval or any applicable statute, regulation, or other legal requirement resulting from any act or omission that caused the adverse effect to the natural environment or impairment of water quality.

Change of Owner

- 1.15 The Owner shall notify the Director in writing, and forward a copy of the notification to the District Manager, within 30 days of the occurrence of any changes:
- (a) the ownership of the Site;
 - (b) appointment of or a change in the Operator of the Site;
 - (c) the address of the Owner or Operator;
 - (d) the partners, where the Owner is or at any time becomes a partnership and a copy of the most recent declaration filed under the Business Names Act, R.S.O. 1990, c. B-17 shall be included in the notification; and

- (e) the name of the corporation where the Owner is or at any time becomes a corporation, other than a municipal corporation, and a copy of the most current information filed under the Corporations Information Act, R.S.O. 1990, c. C-39 shall be included in the notification.

- 1.16 No portion of this Site shall be transferred or encumbered prior to or after closing of the Site unless the Director is notified in advance and sufficient financial assurance is deposited with the Ministry to ensure that these conditions will be carried out.
- 1.17 In the event of any change in ownership of the Site, other than change to a successor municipality, the Owner shall notify the successor of and provide the successor with a copy of this Approval, and shall provide a copy of the notification to the District Manager and the Director.

Inspections

- 1.18 No person shall hinder or obstruct a Provincial Officer in the performance of their duties, including any and all inspections authorized by the OWRA, the EPA or the PA of any place to which this Approval relates, and without limiting the foregoing to:
 - (a) enter upon the premises where the Site are located, or the location where the records required by the conditions of this Approval are kept;
 - (b) have access to, inspect, and copy any records required by the conditions of this Approval;
 - (c) inspect the practices, procedures, or operations required by the terms conditions of this Approval; and
 - (d) sample and monitor for the purposes of assessing compliance with the conditions of this Approval or the EPA, the OWRA or the PA.

2.0 FINANCIAL ASSURANCE

- 2.1 The Owner shall maintain financial assurance, as defined in Section 131 of the EPA, in the amount of **\$476,297.00**. This financial assurance shall be in a form acceptable to the Director and shall provide sufficient funds for the analysis, transportation, Site clean-up, monitoring and disposal of all quantities of waste on Site at any one time.
- 2.2 (a) Commencing on March 31, 2024 and at intervals of three (3) years thereafter, the Owner shall submit to the Director, a re-evaluation of the amount of financial assurance to implement the actions required under Condition 2.1. The re-evaluation shall include an assessment based on any new information relating to the environmental conditions of the Site and shall include the costs of additional monitoring and/or implementation of contingency plans required by the Director upon review of the closure plan and annual reports. The financial assurance must be submitted to the Director within twenty (20) days of written acceptance of the re-evaluation by the Director.

- (b) Commencing on March 31, 2025, the Owner shall prepare and maintain at the Site an updated re-evaluation of the amount of financial assurance required to implement the actions required under Condition 2.1 for each of the intervening years in which a re-evaluation is not required to be submitted to the Director under Condition 2.2 (a). The re-evaluation shall be made available to the Ministry, upon request.

2.3 The amount of financial assurance is subject to review at any time by the Director and may be amended at his/her discretion.

2.4 If any financial assurance is scheduled to expire or notice is received, indicating financial assurance will not be renewed, and satisfactory methods have not been made to replace the financial assurance at least sixty (60) days before the financial assurance terminates, the financial assurance shall forthwith be replaced by cash.

3.0 GENERAL SITE OPERATIONS

Service Area

3.1 Only waste that is generated within Canada and the United States of America shall be accepted at the Site.

Hours of Operation

3.2 Waste may be accepted at the Site 24 hours a day, 365 days of the year.

Signage and Security

3.3 A sign shall be posted and maintained at the main entrance/exit to the Site displaying in a manner that is clear and legible at a distance of twenty-five metres from the public roadway bordering the Site. The sign shall contain the following information:

- (a) the name of the Site and Owner;
- (b) the number of this Approval;
- (c) the normal hours of operation; and
- (d) a telephone number that can be used to reach the Owner, on a 24 hours per day basis.

3.4 The Site shall be operated and maintained in a secure manner, such that unauthorized persons cannot enter the Site.

Nuisance Control

3.5 The Site shall be operated and maintained such that vermin, vectors, dust, litter, odour, noise and traffic do not create a nuisance.

3.6 The Owner shall, at all times, ensure that the noise emissions from the Site comply with the limits set out in Ministry Publication NPC-205 or Publication NPC-232, as applicable.

4.0 APPROVED WASTE TYPES AND QUANTITIES

Approved Waste

4.1 The Site shall only accept:

- (a) solid non-hazardous waste from industrial, commercial and institutional sources;
- (b) municipal hazardous and special waste;
- (c) waste electrical and electronic waste;
- (d) fluorescent and mercury lighting waste;
- (e) batteries;
- (f) liquid industrial waste;
- (g) hazardous waste Waste Classes: 111 to 114 inclusive, 121, 122, 123, 131 to 135 inclusive, 141 to 150 inclusive, 211, 212, 213, 221, 222, 231, 232, 233, 241, 242, 251 to 254 inclusive, 261 to 270 inclusive, 281, 282, and 331 as described in the Ministry document "New Ontario Waste Classes" dated January 1986 or as amended.

Prohibited Waste

4.2 The Site is prohibited from receiving, processing or storing the following types of waste:

- (a) waste from residential sources other than municipal hazardous and special waste;
- (b) food waste;
- (c) waste containing polychlorinated biphenyls in amounts greater than 50 milligrams per litre;
- (d) severely toxic waste (Schedule 3, Reg. 347).

Waste Inspection

4.3 The Owner shall ensure that all waste is inspected by trained personnel prior to being accepted at the Site to ensure that the waste is of a type approved for acceptance under this Approval.

4.4 All in-coming and outgoing wastes shall be inspected and tested by qualified personnel as described in the documentation contained within Schedule "A" of this Approval, prior to being received, processed, transferred and shipped to ensure wastes are being managed and disposed of in accordance with the EPA and Reg. 347.

4.5 In the event that load of waste is refused, a record shall be made in the daily log book identifying the reason the waste was refused and the origin of the waste, if known.

Approved Quantities

4.6 The Owner shall ensure that:

- (a) the amount of waste accepted at the Site does not exceed 800 tonnes of waste per day; and
- (b) the total amount of waste leaving the Site for final disposal, comprised of waste from the transfer operation and residual waste arising from the processing operations, shall not exceed 800 tonnes or equivalent per day.

4.7 The Owner shall ensure that the total maximum amount of waste stored at the Site shall not exceed 1,630 tonnes (or 1,630,000 litres) as follow:

- (a) seven (7) aboveground storage tanks in Tank Farm No.1 (T201 thru T207), equipped with operating and regularly calibrated high level alarms, containing various processed and unprocessed liquid industrial waste and hazardous wastes not to exceed 240,050 litres;
- (b) ten (10) aboveground storage tanks in Tank Farm No. 2 (T101 thru T110), equipped with operating and regularly calibrated high level alarms, containing various processed and unprocessed liquid industrial waste and hazardous wastes not to exceed 900,000 litres;
- (c) two (2) aboveground storage tanks located inside the processing building, equipped with operating and regularly calibrated high level alarms, containing aqueous waste (T209) and oils, fuels and/or miscellaneous organics (T210) not to exceed 90,000 litres each;
- (d) drums, totes and suitable containers of waste containing various processed and unprocessed non-hazardous solid waste, liquid industrial waste and hazardous industrial waste not to exceed 220,000 litres;
- (e) a maximum quantity of 30,000 litres of liquid industrial waste within the East Pit;
- (f) a maximum quantity of 30 tonnes within the West Pit of either:
 - (i) solid non-hazardous industrial waste and/or semi-solid non-hazardous industrial waste, or
 - (ii) hazardous solid industrial waste and/or semi-solid hazardous waste;
- (g) a maximum quantity of 70 tonnes of a combination of either solid non-hazardous industrial waste or solid hazardous waste derived from the solidification activities at the Site, contained in tarped, or otherwise covered, roll-off bins located within the 'Warehouse Building', the 'Sludge and Solids Processing Building', and within the fenced compound at the southwest corner of the property; and
- (h) a maximum quantity of 100 tonnes of sawdust, fly ash, cement dust, spent lime or other reagent suitable for use as a solidification or binding agents.

4.8 For the purposes of assessing compliance with this Approval, a general conversion factor for solids to liquids shall be one (1) tonne = 1,000 kilograms = 1,000 litres and will not incorporate the specific gravity of the waste.

Waste Storage

- 4.9 The Owner shall ensure that all waste shall be stored in accordance with the Ministry publication "Guidelines for Environmental Protection Measures at Chemical and Waste Storage Facilities", dated May 2007 or as amended.
- 4.10 The Owner shall ensure that wastes are kept segregated from other incompatible wastes and materials.
- 4.11 (a) The Owner shall ensure that all waste storage containers at the Site have a label or sign identifying the waste, including waste class(es) and waste characteristic if applicable, and, when applicable, the WHMIS and TDGA classification of the contents contained within. The label or sign shall be clearly visible for inspection and record keeping; and
- (b) The Owner shall keep a container inventory for all materials stored at the Site to be made available to any Provincial Officer upon request.

5.0 WASTE PROCESSING ACTIVITIES

General

- 5.1 The Owner shall ensure that all reasonable measures in the way of laboratory, compatibility and bench testing of waste and materials shall be taken to ensure that the bulking, blending, mixing, transfer and processing of wastes at the Site will not result in uncontrollable reactions that could result in a fire or release of contaminants to the natural environment.

Approved Processes

- 5.2 The Owner shall ensure that processing carried out at the Site is limited to the following operations as described in Item 5 of Schedule "A" which forms part of this Approval:
- (a) physical and chemical wastewater treatment;
- (b) bulking and blending of compatible waste streams;
- (c) solidification and fixation/stabilization of solid and semi-solid wastes; and
- (d) mechanical destruction.
- 5.3 The Owner shall ensure that listed subject wastes are not mixed, bulked, blended, put into a common container, or processed with any other waste material at the Site unless the procedures specified in this Condition are followed:
- (a) only chemically compatible wastes may be mixed bulked or blended;
- (b) a mixture of an acute hazardous waste chemical and any other waste(s) remains an acute hazardous waste chemical;
- (c) a mixture of a hazardous waste chemical and any other waste(s), except an acute hazardous waste chemical, remains a hazardous waste chemical; and

(d) a mixture of a hazardous industrial waste and any other waste(s), except an acute hazardous waste chemical or a hazardous waste chemical, remains a hazardous industrial waste.

5.4 The waste characterization (i.e. H, A, B or S hazardous waste characterization suffix) of listed subject waste can not be changed by the Owner with the exception of wastes received in lab packs. Where individual containers within the lab pack have a waste characterization suffix different from that of the lab pack as a whole, and the contents of the smaller containers are bulked into larger containers of similar waste characteristics for the sole purposes of transporting waste for final disposal, the waste characterization suffix appropriate for the listed subject waste in the individual containers may be used.

5.5 At no time is burning or incineration of any waste materials allowed on the Site.

6.0 WASTE WATER TREATMENT

6.1 The Owner shall ensure that Site processes and equipment are not operated and no waste is received at the Site unless industrial sewage works approvals under Section 53, of the OWRA, where applicable, have been obtained. The Owner shall manage all direct discharges from this Site, including stormwater run-off, in accordance with appropriate municipal, provincial and/or federal legislation, regulations and by-laws.

6.2 Wastewater shall be processed at the Site in accordance with the application and supporting documentation as listed in Schedule "A" and as follows:

- (a) wastewater shall be processed at a rate not exceeding 227,000 litres per day;
- (b) should Listed Subject Waste be included in a wastewater treatment batch, the processed batch of wastewater shall not be deemed to be Treated Wastewater and shall be handled in accordance with Condition 5.3 of this Approval; and
- (c) Treated Wastewater shall be managed in accordance with the Sewer Use By-law and the Sewer Use Agreement between the Owner and the Corporation of the Municipality of Chatham-Kent as found in Item 5 of Schedule "A" which forms part of this Approval.

6.3 (a) In the event that random sampling conducted by the Municipality of Chatham-Kent indicates that a wastewater discharge from the Site exceeded the Sewer Use By-law, the Owner shall immediately notify the District Manager in writing, initiate appropriate steps to determine the cause of the exceedance and shall take all necessary actions to eliminate the cause including a review of the existing procedures; and

- (b) Within seven (7) days of receiving notification from the Municipality of Chatham-Kent, the Owner shall provide to the District Manager a report summarizing the results of the actions taken under Condition 6.3(a) and any recommendations for managerial or operational changes to reasonably avoid the recurrence of similar incidents. Any changes to the Facility Design and Standard Operating Procedures manual shall be submitted to the Director for approval.

6.4 Should Listed Subject Waste be included in a wastewater treatment batch, the sludge derived from the processing of the batch, and all sludge mixed with the sludge derived from the batch, shall be deemed to have been derived from the Listed Subject Waste, and the sludge shall be handled in accordance with Condition 5.3.

7.0 SITE INSPECTIONS

7.1 On each day that the Site is in operation, the Owner shall conduct an inspection of the entire Site to ensure that:

- (a) the Site is secure;
- (b) the operation of the Site is not causing any nuisances;
- (c) the operation of the Site is not causing any adverse effects on the environment and that the Site is being operated in compliance with this Approval.

Any deficiencies discovered as a result of the inspection shall be remedied immediately, including temporarily ceasing operations at the Site if needed.

7.2 On an annual basis, the Owner shall conduct a detailed inspection of each storage tank at the Site. At a minimum the storage tanks shall be emptied of all waste, flushed clean and visually inspected both internally and externally for evidence of deterioration. In the event that significant deterioration is observed the Owner shall retain the services of a qualified contractor to carry out the necessary repairs to the storage tank prior to it being put back into service.

7.3 Once every ten (10) years, the Owner shall retain the services of a qualified third party to conduct an appropriate non-destructive testing technique on each storage tank at the Site to verify the continued structural integrity of the storage tank. In the event that a tank is determined to be defective and presents an increased risk of failure the tank shall be forthwith removed from use until such time that it can be repaired satisfactorily or replaced.

8.0 EQUIPMENT MAINTENANCE

8.1 The Owner shall ensure that the Equipment is properly operated and maintained at all times. The Owner shall:

- (a) prepare, not later than three (3) months after the date of this Approval, and update, as necessary, a Manual outlining the operating procedures and a maintenance program for the Equipment, including:
 - (i) routine operating and maintenance procedures in accordance with good engineering practices and as recommended by the Equipment suppliers;
 - (ii) emergency procedures, including spill clean-up procedures;

- (iii) procedures for any record keeping activities relating to operation and maintenance of the Equipment;
 - (iv) all appropriate measures to minimize noise and odorous emissions from all potential sources;
 - (v) the frequency of inspection of the Equipment;
 - (vi) procedures for recording and responding to environmental complaints, including odour complaints relating to operation of the Facility; and,
 - (vii) list of Trained Personnel responsible for the operation and maintenance of the Facility;
- (b) implement the recommendations of the Manual.

9.0 TRAINING

- 9.1 A training plan shall be developed and maintained for all employees that operate the Site. Only Trained Personnel may operate the Site or carry out any activity required under this Approval.
- 9.2 The Owner shall ensure that Trained Personnel are available at all times during the hours of operation of this Site. Trained Personnel shall supervise all transfer or processing of waste material at the Site.
- 9.3 All staff that operate the Site shall be fully trained in the use of the Emergency Response Plan and in the procedures to be employed in the event of an emergency.

10.0 COMPLAINT RESPONSE

- 10.1 If at any time the Owner receives complaints regarding the operation of the Site, the Owner shall respond to these complaints according to the following procedure:
- (a) record and number each complaint, either electronically or in a separate log book, and shall include the following information:
 - (i) the nature of the complaint;
 - (ii) if complaint is odour or nuisance related, the weather conditions and wind direction at the time of the complaint;
 - (iii) the name, address and the telephone number of the complainant (if provided);
 - (iv) the time and date of the complaint;
 - (v) operating conditions (such as operating parameters and production or processing rates), as well as any upset conditions, or unusual events, at the time of the complaint;
 - (b) the Owner, upon notification of the complaint, shall initiate appropriate steps to determine all possible causes of the complaint, proceed to take the necessary actions to eliminate the cause of the complaint and forward a formal reply to the complainant; and

- (c) the Owner shall complete and retain on-site a report written within one (1) week of the complaint date, listing the measure taken to address the cause of the incident to which the complaint relates, and any recommendations for remedial measures, and managerial or operational changes, to reasonably avoid the recurrence of similar incidents.

11.0 EMERGENCY RESPONSE

Spill Reporting

- 11.1 All spills, as defined by the EPA, shall be immediately reported to the Ministry's Spill Action Centre at 1-800-268-6060.

Spill Response

- 11.2 The Owner shall immediately take all measures necessary to contain and clean up any spill or leak which may result from the operation of this Site and immediately implement the Emergency Response Plan if required.

Emergency Response Plan

- 11.3 The Owner shall develop and maintain an Emergency Response Plan for the Site that is acceptable to the Director, local municipality and the local fire department. At a minimum the Emergency Response Plan shall include the following:
 - (a) emergency response procedures to be undertaken in the event of a spill or process upset, including specific clean up methods for each different type of waste the Site is approved to accept;
 - (b) a list of equipment and spill clean up materials available in case of an emergency; and
 - (c) notification protocol with names and telephone numbers of persons to be contacted, including:
 - (i) persons responsible for the Site,
 - (ii) regulatory authorities including the District Manager, the Ministry's Spills Action Centre, the local fire department, the local municipality, the local Medical Officer of Health, and the Ministry of Labour, and
 - (iii) waste management companies available for emergency response.
- 11.4 The Emergency Response Plan shall be kept up to date, and a copy shall be retained in a central location on the Site that is accessible to all staff at all times.
- 11.5 Changes to the Emergency Response Plan shall be submitted to the Director for approval with a copy to the District Manager, the local municipality and the local fire department.

- 11.6 The equipment, materials and personnel requirements outlined in the Emergency Response Plan shall be immediately available on the Site at all times. The equipment shall be kept in a good state of repair and in a fully operational condition.

12.0 DOCUMENTATION AND REPORTING

Availability of Records

- 12.1 Any information requested, by the Ministry, concerning the Site and its operation under this Approval, including but not limited to any records required to be kept by this Approval, shall be provided to the Ministry, upon request.

Record Retention

- 12.2 The Owner shall retain, for a minimum of two (2) years from the date of their creation, all records and information related to or resulting from the recording activities required by this Approval.

Facility Design & Standard Operating Procedures Manual

- 12.3 (a) The Facility Design & Standard Operating Procedures manual shall be retained at the Site, kept up to date, and be available for inspection by Ministry staff. The Facility Design & Standard Operating Procedures manual shall contain detailed procedures relating to all aspects of the handling of waste at the Site as described in Item 4 of Schedule "A".
- (b) Changes to the Facility Design & Standard Operating Procedures manual shall be submitted to the Director for approval.
- (c) Submission of an Application for Environmental Compliance Approval shall be accompanied by an updated version of the Facility Design & Standard Operating Procedures manual revised to incorporate the requested amendments.

Daily Log Book

- 12.4 The Owner shall maintain, at the Site for a minimum of five (5) years, a log book(s) or electronic file which records daily the following information:
- (a) date;
 - (b) types (class and primary characteristic), quantities and source of waste received;
 - (c) quantity of unprocessed, processed and residual waste on the Site;
 - (d) types (class and primary characteristic), quantities and destination of each type of waste shipped from the Site;
 - (e) the wastewater treatment records required by Condition 43 and 44 of this Approval;
 - (f) a record of daily inspections required by this Approval;

- (g) a record of any waste refusals which shall include amounts, reasons for refusal and actions taken; and
- (h) the signature of the trained person conducting the inspection and completing the report.

Listed Subject Wastes

- 12.5 The Owner shall maintain for a period of five (5) years, a record available for inspection, tracking the path of waste movement through the Site for Listed Subject Waste, including as a minimum:
- (a) date of receipt of the waste, including manifest number;
 - (b) waste class and waste characteristic;
 - (c) volume or mass of waste received;
 - (d) date and location of disposal of the Listed Subject Waste including the manifest number.

Waste water

- 12.6 The Owner shall maintain for a period of five (5) years a record available for inspection, tracking the processing of wastewater. Records shall be made for each batch of wastewater processed and at a minimum shall include the following:
- (a) the date and batch number;
 - (b) the volume, waste class and characteristic of each waste type included in the batch;
 - (c) the total quantity of wastewater to be processed in the batch;
 - (d) the signature of the Trained Personnel that confirms the batch contains or does not contain Listed Subject Waste;
 - (e) the analysis and test results for the parameters and contaminants as required by the Sewer Use By-law for each batch of Treated Wastewater that is discharged to the sanitary sewer system including the signature of the Trained Personnel that confirms that the Treated Wastewater is suitable for discharge to the municipal sewage treatment facility;
 - (f) the volume, waste class and characteristic, and the name and location of the final disposal site for each batch that upon processing could not meet the requirements of the Sewer Use By-law; and
 - (g) the volume, waste class and characteristic, and the name and location of the final disposal site for each batch that contained a Listed Subject Waste.
- 12.7 The Owner shall maintain for a period of five (5) years a record available for inspection, tracking the disposal of sludge. Records shall be made for each outgoing shipment of sludge resulting from the processing of wastewater and at a minimum shall include the following:
- (a) the batch number(s) of all wastewater treatment batches from which the sludge was derived;
 - (b) the quantity of sludge produced;
 - (c) the waste class and characteristic assigned to the sludge; and
 - (d) the name and location of the final disposal site.

Inspections

- 12.8 A record of the inspections shall be kept in the daily log book that includes the following information:
- (a) the name and signature of person that conducted the inspection;
 - (b) the date and time of the inspection;
 - (c) a list of any deficiencies discovered;
 - (d) any recommendations for remedial action; and
 - (e) the date, time and description of actions taken.

Equipment Records

- 12.9 The Owner shall retain all records on the maintenance, repair and inspection of the Equipment. These records available for review by staff of the Ministry upon request.

Spills or Process Upsets

- 12.10 The Owner shall maintain a record of any spills or process upsets at the Site, including but not limited to:
- (a) the nature of the spill or process upset; and
 - (b) the action taken for the clean up or correction of the spill;
 - (c) the time and date of the spill or process upset; and
 - (d) for spills, the date and time that the Ministry and other persons were notified of the spill in fulfilment of the reporting requirements in the EPA.

Annual Report

- 12.11 By March 31st, on an annual basis, the Owner shall prepare, and submit to the District Manager, a written report for the previous calendar year. The annual report shall include, at a minimum, the following information:
- (a) a detailed monthly summary of the type, quantity and origin of all wastes received, processed and transferred from the Site, including the destination, type and quantity of waste destined for final disposal and also including any reconciliations on mass balance made;
 - (b) a detailed monthly summary of the daily log records;
 - (c) a record of the storage tank inspections records;
 - (d) any environmental and operational problems, that could negatively impact the environment, encountered during the operation of the Site and during the facility inspections and any mitigative actions taken;
 - (e) any changes to the Emergency Response Plan and/or the Facility Design & Standard Operating Procedures manual that have been approved by the Director since the last annual report; and

- (f) any recommendations to minimize environmental impacts from the operation of the Site and to improve Site operations and monitoring programs in this regard.

13.0 CLOSURE PLAN

- 13.1 Six (6) months prior to the planned closure of this Site, the Owner shall provide to the Director, for written approval, a written closure plan for the Site. This plan must include, as a minimum, a description of the work that will be done to facilitate closure of the Site and a schedule for completion of that work.
- 13.2 The Owner shall implement the closure plan, after it has been approved, in writing, by the Director.
- 13.3 Within ten (10) days after closure of the Site, the Owner shall notify the Director, in writing, that the Site is closed and that the approved closure plan has been implemented.

SCHEDULE "A"

This Schedule "A" forms part of Environmental Compliance Approval No. 6625-6EMMZ3.

1. Application for a Provisional Certificate of Approval for a Waste Disposal Site, submitted by 1206765 Ontario Limited and signed by Bruce Coristine, dated April 26, 2005 including Attachment 1- Legal Description and Survey and Attachment 2 - Verification of Legal Name.
2. Information Request Letter dated June 6, 2005 from Tim Edwards, Ministry of the Environment, to Bruce Coristine, 1206765 Ontario Limited, requesting additional details and clarification with respect to Attachment 3 - Supporting Information included within the April 26, 2005 application package.
3. Information Request Letter dated August 12, 2005 from Tim Edwards, Ministry of the Environment, to Bruce Coristine, 1206765 Ontario Limited, requesting additional details and clarification with respect to revised Attachment 3 - Supporting Information received by the Ministry on July 18, 2005.
4. Email dated September 19, 2005 from Bruce Coristine, 1206765 Ontario Limited, to Tim Edwards, Ministry of the Environment, clarifying the scope of the Operations Manual and providing roll-off box construction details.
5. Revised Attachment 3 - Supporting Information (to Application for Certificate of Approval for a Waste Disposal Site (Processing/Transfer)), including Design and Operations Report, Drainage Study, Financial Assurance etc. including all drawings, tables and Appendices A through T, dated August 30, 2005 as received via courier September 26, 2005.
6. Application for a Certificate of Approval (Air) and all supporting information dated September 10, 2006, signed by Mike Hannigan.
7. Application for an Amendment to Provisional Certificate of Approval for a Waste Disposal Site, dated May 15, 2008 from Veolia ES Canada Industrial Services Inc., and supporting documentation (Design and Operations Report, with Decommissioning Plan, May 15, 2008 included).
8. E-mail dated January 29, 2009 from Rob Ebere, Veolia ES Canada Industrial Services Inc., to Roman Lysiak, MOE regarding submission of additional information.
9. E-mail dated March 31, 2009 from Charlene Mehlenbacher, Veolia ES Canada Industrial Services Inc., to Roman Lysiak, MOE regarding submission of additional information.
10. E-mail dated April 2, 2009 from Bruce Coristine, Veolia ES Canada Industrial Services Inc., to Roman Lysiak, MOE regarding submission of additional information.

11. E-mail dated April 6, 2009 from Dan Boehm, Veolia ES Canada Industrial Services Inc., to Roman Lysiak, MOE regarding submission of additional information (Financial Assurance data).
12. E-mail dated June 15, 2011 with enclosure from David Flahaut, M.Env., chimiste, Directeur affaires environnementales-Canada, Veolia ES Canada Services Industriels Inc. to Jim Chisholm of the Ministry of the Environment.
13. Veolia ES Canada Industrial Services Inc., Waste Processing & Disposal Facility, Operations Manual, 2011.
14. Environmental Compliance Approval Application, dated , May 1, 2013 and signed by David Flahaut, Environmental Affairs Manager - Canada.
15. Facility Design & Standard Operating Procedures, Veolia Environmental Services, Chatham Waste Transfer/Processing Facility, V 3.0: October 2013.
16. Emission Summary and Dispersion Modelling Report, submitted by Veolia ES Canada Industrial Services Inc., dated April 30, 2013 and additional information in support of the application provided by Talal Al Saied, Technical Project Manager, Veolia ES Canada Industrial Services Inc.
17. Environmental Compliance Approval Amendment Application, dated August 1, 2017 and signed by Talal Al Saied, Environmental, Health and Safety Manager, Veolia ES Canada Industrial Services Inc. RE: Financial Assurance Re-evaluation.
18. Environmental Compliance Approval Amendment Application, dated October 30, 2020 and signed by Talal Al Saied, Environmental, Health and Safety Manager, Veolia ES Canada Industrial Services Inc. RE: Updated Design and Operations Report for solidification pit replacement, including all attached supporting information.
19. Report entitled "Design and Operations Report, Veolia Environmental Services", version 3.0, dated October 2020 including all figures and appendices.

SCHEDULE "B"

This Schedule "B" forms part of Environmental Compliance Approval No. 6625-6EMMZ3.

Vessel	Fluid Capacity (Litres)	Solid Capacity (Tonnes)	Purpose	Product
T101	90,000	N/A	Process/Storage	Spill Tank
T102	90,000	N/A	Process/Storage	Oils (saleable)
T103	90,000	N/A	Process/Storage	Oils (saleable)
T104	90,000	N/A	Process/Storage	Oily Water
T105	90,000	N/A	Process/Storage	Aqueous Waste
T106	90,000	N/A	Process/Storage	Oily Water
T107	90,000	N/A	Process/Storage	Lean/Rich Organics
T108	90,000	N/A	Process/Storage	Lean/Rich Organics
T109	90,000	N/A	Process/Storage	Aqueous Waste
T110	90,000	N/A	Process/Storage	Oils, Fuels, Misc Organics
T201	13,650	N/A	Process/Storage	Waste Acid
T202	22,700	N/A	Reagents	Ferric
T203	22,700	N/A	Reagents	Caustic
T204	55,000	N/A	Process/Storage	Clean Water
T205	40,000	N/A	Process/Storage	Waste Acid
T206	39,600	N/A	Process/Storage	Waste Acid
T207	46,400	N/A	Process/Storage	Oily Water
T209	45,000	N/A	Process/Storage	Treated Waste Water
T210	45,000	N/A	Process/Storage	Treated Waste Water
Pit Tank	40,000	N/A	Process/Storage	Aqueous Waste
East Pit	30,000	N/A	Solidification	Non-hazardous Waste
West Pit	N/A	30	Solidification	Hazardous Waste
Drum Pad	220,000	N/A	Drum Waste	1000 Misc Drums
Lugger Storage	N/A	70	Process/Storage	Sludge Hazardous & Non-hazardous Waste

The reasons for the imposition of these terms and conditions are as follows:

The reason for Conditions 1.1, 1.2, 1.8, 1.9, 1.10, 1.12, 1.13 and 1.14 is to clarify the legal rights and responsibilities of the Owner and Operator.

The reason for Conditions 1.3 and 12.3 is to ensure that the Site is operated in accordance with the application and supporting documentation submitted by the Owner, and not in a manner which the Director has not been asked to consider.

The reason for Conditions 1.4, 1.5, 1.6 and 1.7 is to clarify how to interpret this approval in relation to the application and supporting documentation.

The reason for Condition 1.11 is to ensure compliance with Provincial Officer's Order No. P451211 issued to St. Lawrence Cement to include the shipment of product solvents from Philip Services Inc., to be wholly utilized at St. Lawrence Cement in Mississauga.

The reasons for Condition 1.15 is to ensure that the Site is operated under the corporate name which appears on the application form submitted for this approval, and to ensure that the Director is informed of any changes.

The reason for Condition 1.16 is to restrict potential transfer or encumbrance of the Site without the approval of the Director. Transfer of encumbrance can be made only on the basis that it will not endanger compliance with this Approval.

The reason for Condition 1.17 is to ensure that subsequent owners of the Site are informed of the terms and conditions of this Approval. This also applies to all supporting documents listed in Schedule "A".

The reason for Condition 1.18 is to ensure that appropriate Ministry staff have ready access to the Site for inspection of facilities, equipment, practices and operations required by the conditions in this Certificate of Approval. This condition is supplementary to the powers of entry afforded a Provincial Officer pursuant to the EPA and OWRA.

The reason for Conditions 2.1, 2.2, 2.3 and 2.4 is to ensure that sufficient funds are available to the Ministry to clean up the Site in the event that the Owner is unable or unwilling to do so.

The reason for Condition 3.1 is to specify the approved service area from which waste may be accepted at the Site, based on the Owner's application and supporting documentation.

The reason for Condition 3.2 is to specify the hours of operation for the Site.

The reason for Condition 3.3 is to ensure that emergency responders and the public have the necessary information to contact the Owner in the event of an emergency or complaint.

The reason for Condition 3.4 is to ensure the controlled access and integrity of the Site by preventing unauthorized access when the Site is closed and no site attendant is on duty.

Conditions 3.5 and 3.6 are included to provide the minimum performance requirements considered necessary to prevent an adverse effect resulting from the operation of the Site.

The reason for Conditions 4.1, 4.2, 4.3 and 4.5 is to specify the types of waste that may be accepted at the Site, based on the Owner's application and supporting documentation.

The reason for Condition 4.4 is to ensure that all wastes are properly classified to ensure that they are managed, processed and disposed in accordance with Ontario Regulation 347, R.R.O. 1990 and in a manner that protects the health and safety of people and the public.

The reason for Conditions 4.6 and 4.7 is to specify the maximum rate at which the Site may receive waste and the amounts of waste that may be stored at the Site, based on the Owner's application and supporting documentation.

The reason for Condition 4.8 is to clarify the conversion factor to be used when accessing compliance with this Approval.

The reason for Conditions 4.9, 4.10 and 4.11 is to ensure that waste storage is done in a manner which does not result in a nuisance or a hazard to the health and safety of the environment or the public.

The reason for Conditions 5.1, 5.2, 5.3, 5.4, 5.5, 6.1, 6.2, 6.3 and 6.4 is to ensure that the Site is operated in a manner which does not result in a nuisance or a hazard to the health and safety of the environment or people.

The reason for Conditions 7.1, 7.2 and 7.3 is to ensure that all equipment and facilities are maintained in good working order.

Condition 8.1 is included to emphasize that the Equipment must be maintained and operated according to a procedure that will result in compliance with the EPA, the Regulations and this Approval.

The reason for Conditions 9.1, 9.2 and 9.3 is to ensure that the Site is operated by, and in the presence of, properly trained staff.

The reason for Condition 10.1 is to ensure that any complaints regarding Site operations are responded to in a timely manner.

The reason for Condition 11.1 is to ensure that the Owner notifies the Ministry forthwith of any spill, as required by Part X of the EPA, so that appropriate spills response can be determined.

The reason for Condition 11.2 is to ensure that the Owner immediately responds to a spill.

The reason for Conditions 11.3, 11.4, 11.5 and 11.6 is to ensure that an Emergency Response Plan is developed and maintained at the Site so that the Owner is prepared and staff are properly trained in emergency response procedures.

Condition 12.1 is included to require the Owner to provide information to staff of the Ministry so that compliance with the EPA, its regulations and this Approval can be verified.

The reason for Conditions 12.2, 12.4, 12.5, 12.6, 12.7 and 12.10 is to ensure that accurate records are maintained to demonstrate compliance with the Conditions of this Approval, the EPA and its regulations.

The reason for Conditions 12.8 and 12.9 is to ensure that detailed records of Site inspections are recorded and maintained for inspection and information purposes.

The reason for Condition 12.11 to ensure that regular review of site development, operations and monitoring data is documented and any possible improvements to site design, operations or monitoring programs are identified. An annual report is an important tool used in reviewing site activities and for determining the effectiveness of site design.

The reason for Conditions 13.1, 13.2 and 13.3 is to ensure that the Site is closed in accordance with Ministry standards so as to protect the health and safety of the public and the environment.

The reason for Schedule "B" is to provide a list of waste and processed waste which must be taken into account when calculating financial assurance.

Upon issuance of the environmental compliance approval, I hereby revoke Approval No(s). 6625-6EMMZ3 issued on August 19, 2014 including any amending notices.

In accordance with Section 139 of the Environmental Protection Act, you may by written Notice served upon me, the Environmental Review Tribunal and in accordance with Section 47 of the Environmental Bill of Rights, 1993, the Minister of the Environment, Conservation and Parks, within 15 days after receipt of this Notice, require a hearing by the Tribunal. The Minister of the Environment, Conservation and Parks will place notice of your appeal on the Environmental Registry. Section 142 of the Environmental Protection Act provides that the Notice requiring the hearing shall state:

- a. The portions of the environmental compliance approval or each term or condition in the environmental compliance approval in respect of which the hearing is required, and;
- b. The grounds on which you intend to rely at the hearing in relation to each portion appealed.

Pursuant to subsection 139(3) of the Environmental Protection Act, a hearing may not be required with respect to any terms and conditions in this environmental compliance approval, if the terms and conditions are substantially the same as those contained in an approval that is amended or revoked by this environmental compliance approval.

The Notice should also include:

1. The name of the appellant;
2. The address of the appellant;

3. The environmental compliance approval number;
4. The date of the environmental compliance approval;
5. The name of the Director, and;
6. The municipality or municipalities within which the project is to be engaged in.

And the Notice should be signed and dated by the appellant.

This Notice must be served upon:

The Secretary*
Environmental Review Tribunal
655 Bay Street, Suite 1500
Toronto, Ontario
M5G 1E5

AND

The Minister of the Environment,
Conservation and Parks
777 Bay Street, 5th Floor
Toronto, Ontario
M7A 2J3

AND

The Director appointed for the purposes of
Part II.1 of the Environmental Protection Act
Ministry of the Environment,
Conservation and Parks
135 St. Clair Avenue West, 1st Floor
Toronto, Ontario
M4V 1P5

*** Further information on the Environmental Review Tribunal's requirements for an appeal can be obtained directly from the Tribunal at: Tel: (416) 212-6349, Fax: (416) 326-5370 or www.ert.gov.on.ca**

This instrument is subject to Section 38 of the Environmental Bill of Rights, 1993, that allows residents of Ontario to seek leave to appeal the decision on this instrument. Residents of Ontario may seek leave to appeal within 15 days from the date this decision is placed on the Environmental Registry. By accessing the Environmental Registry at <https://ero.ontario.ca/>, you can determine when the leave to appeal period ends.

The above noted activity is approved under s.20.3 of Part II.1 of the Environmental Protection Act.

DATED AT TORONTO this 4th day of November, 2021



Mohsen Keyvani, P.Eng.
Director
appointed for the purposes of Part II.1 of the
Environmental Protection Act

DL/

c: Area Manager, MECP Windsor

c: District Manager, MECP Sarnia

Terri Riley - AECOM, Veolia ES Canada Industrial Services Inc.